



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

March 2022 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEVE LEE DOMINGUEZ,

Defendant.

CR 2:22-cr-00177-ODW

I N D I C T M E N T

[18 U.S.C. §§ 245(b)(2)(B),
(b)(5): Bias-Motivated
Interference with Federally
Protected Activities]

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

At times relevant to this Indictment:

1. On Sunday, March 21, 2021, community organizers and community members organized a "Stop Asian Hate" rally in Diamond Bar, California, located in Los Angeles County, to speak out against and bring awareness to the increase in hate crimes and hate incidents against members of the Asian American and Pacific Islander ("AAPI") community in Los Angeles, California and throughout the country, including the March 16, 2021 shooting murders of six Asian-American women in Atlanta, Georgia.

1 2. A group of rally participants assembled at and near the
2 intersection of Diamond Bar Boulevard and Grand Avenue (the
3 "intersection") with American flags and large signs supporting their
4 cause, which were visible to cars driving by. The participants
5 peacefully gathered at the four corners of the intersection holding
6 signs and chanting, and lawfully crossed the streets using the marked
7 pedestrian crosswalk when they had the legal right of way.

8 3. Rally participants were participating in and enjoying the
9 benefits of the public sidewalks and crosswalks in Diamond Bar,
10 California. Rally participants were also participating lawfully in
11 speech and peaceful assembly to oppose racially motivated violence
12 and harassment that denied members of the AAPI community the right to
13 enjoy public streets and sidewalks, public parks, restaurants, retail
14 stores, public schools, and transportation without discrimination on
15 account of race, color, and national origin. Specifically:

16 a. Victim V.C. was an adult Asian female rally
17 participant, carrying a sign that read "STOP ASIAN HATE."

18 b. Victim B.W. was an adult Asian male rally participant.

19 c. Victim S.P. was an adult Asian male rally participant.

20 d. Victim B.H. was an adult Asian female rally
21 participant, carrying a sign that read "STOP ASIAN HATE."

22 e. Victim Z.C. was an adult Asian male rally participant.

23 f. Victim C.H. was a minor African-American female rally
24 participant, carrying a sign that read "END THE VIOLENCE AGAINST
25 ASIANS."

26 4. Defendant STEVE LEE DOMINGUEZ was a 55-year-old male and
27 resident of Diamond Bar, California. Defendant DOMINGUEZ was the
28 registered owner of a black Honda four-door sedan.

1 5. On March 21, 2021, defendant DOMINGUEZ was driving his
2 Honda, stopped at a red light at the intersection of Diamond Bar
3 Boulevard and Grand Avenue, at the center of the "Stop Asian Hate"
4 rally. Defendant DOMINGUEZ started yelling "Go back to China!" and
5 "Fuck China!" to the rally participants at the intersection,
6 including Victims V.C., B.W., S.P., B.H., Z.C., and C.H. Defendant
7 DOMINGUEZ then deliberately drove his car through the crosswalk of
8 the intersection at the red light, made an illegal U-Turn, and cut
9 off the route of several rally participants lawfully crossing the
10 pedestrian crosswalk, including Victims V.C., B.W., S.P., B.H., Z.C.,
11 C.H., other adults, and one approximately 9-year-old child.
12 Defendant DOMINGUEZ yelled "Fuck China!" while driving through the
13 crosswalk and narrowly missed coming into contact with rally
14 participants, including the 9-year-old child, who had to move to
15 avoid the car. Defendant DOMINGUEZ then pulled his car over some
16 distance away from the intersection, got out of the car, and
17 continued to yell racial epithets at the rally participants,
18 including: "Come on you Fucking N*****" "Come on you N*****!" "You
19 J** Motherfucker!" "Fuck China!" "Fuck you, you G***!" and "I'll be
20 back!"

21 6. On March 21, 2021, after driving his car through the
22 pedestrian crosswalk, between rally participants who were legally
23 using the crosswalk at the intersection and had to move to avoid the
24 car, defendant DOMINGUEZ called 911, identified himself as "John
25 Doe," and made a false report to the police to further interfere with
26 the rally participants' enjoyment of the public streets and their
27 lawful assembly and speech. Specifically, defendant DOMINGUEZ
28 falsely stated that the rally participants were blocking the street

1 and that he had to run a red light "because they were about to
2 trample my car," and requested that the police "get some control out"
3 to the intersection of Diamond Bar Boulevard and Grand Avenue.

4 7. These Introductory Allegations are incorporated into all
5 Counts of this Indictment.

COUNT ONE

[18 U.S.C. § 245(b)(2)(B)]

8. On or about March 21, 2021, in Los Angeles County, within the Central District of California, defendant STEVE LEE DOMINGUEZ willfully, by force and threat of force, intimidated and interfered with individuals because of their race, color, and national origin, and because they were enjoying a facility provided and administered by a State and subdivision thereof. Specifically, as rally participants were lawfully crossing a pedestrian crosswalk at the intersection of Grand Avenue and Diamond Bar Boulevard in Diamond Bar, California, defendant DOMINGUEZ used his car to intimidate them and to cut off the pedestrians' route by unlawfully making a U-Turn and driving through the pedestrian crosswalk. The offense included the use, attempted use, and threatened use of a dangerous weapon, namely, a car.

COUNT TWO

[18 U.S.C. § 245(b)(5)]

9. On or about March 21, 2021, in Los Angeles County, within the Central District of California, defendant STEVE LEE DOMINGUEZ willfully, by force and threat of force, intimidated and interfered with individuals because they were and had been participating lawfully in speech and peaceful assembly opposing the denial of the opportunity to participate in any federally protected activity without discrimination on account of race, color, and national origin. Specifically, as rally participants were participating lawfully in speech and peaceful assembly opposing racially motivated violence and harassment that denied members of the AAPI community the right to enjoy public streets and sidewalks, public parks, restaurants, retail stores, public schools, and transportation without discrimination on account of race, color, and national origin, at the intersection of Grand Avenue and Diamond Bar Boulevard in Diamond Bar, California, defendant DOMINGUEZ used his car to

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1 intimidate and to cut off the rally participants' route by unlawfully
2 making a U-turn and driving through the pedestrian crosswalk. The
3 offense included the use, attempted use, and threatened use of a
4 dangerous weapon, namely, a car.

5
6 A TRUE BILL

7
8 /S/

9 Foreperson

10 TRACY L. WILKISON
11 United States Attorney

12 

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